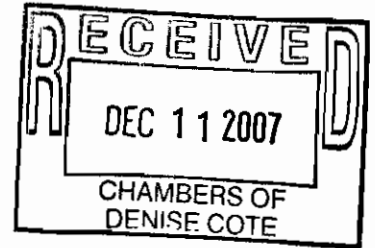


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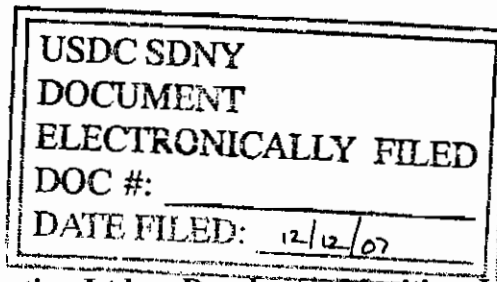
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December 11, 2007

**By Hand**

Hon. Denise L. Cote  
United States District Judge  
United States Courthouse  
500 Pearl St., Room 1040  
New York, NY 10007



**MEMO ENDORSED**

**Re: Eurozone Navigation Ltd. v. Dorchester Maritime Ltd. and Dorchester  
Atlantic Marine Ltd.  
Case No. 07-CV-11083 (DLC), S.D.N.Y.**

Dear Hon. Judge Cote:

We represent the Plaintiff, Eurozone Navigation Ltd. ("Eurozone") in the above captioned action.

On December 7, 2007, Eurozone filed a Verified Complaint for damages in the amount of \$1,261,990.01 and requested the Court to issue an Ex Parte Order for Process of Maritime Attachment and Garnishment ("Attachment Order"). On the same day the Court issued the Attachment Order (copy enclosed), but only authorized the attachment of the principal amount of the claim of \$752,967.34 alleged in Eurozone's Verified Complaint (copy enclosed).

We write to respectfully request the Court to reconsider the decision to exclude interest and costs, the latter representing the fees of arbitrators, attorneys and expert witnesses from the Attachment Order. Our research indicates that in a very recent decision in Great Eastern Shipping Co. Ltd. v. Phoenix Shipping Corporation et. al., 2007 U.S. Dist. Lexis 88911 (S.D.N.Y. 2007) your Honor similarly issued an attachment order which reflected only the amount sought in the principal claims. The plaintiff like in our case sought to amend the order to reflect the full sum initially sought, but that request was denied because "no legal or factual support for the interest or costs sought was provided with the application." Id. at \*2

In the present case, Eurozone's Memorandum of Law (copy attached) at Point II cites to a number of cases in this District that in addition to the principal claims have included anticipated

interest, costs and attorneys' fees. The Verified Complaint also sets forth Eurozone's interest calculations and its claim for attorneys' fees which are routinely awarded in London arbitration.

In the circumstances, we respectfully request the Court to issue an amended Attachment Order to include the claims for interest, attorneys' fees and other taxable costs as both legal and factual support for these requests have been provided in the underlying Rule B application. Cf. Great Eastern Shipping Co. Ltd., 2007 U.S. Dist. Lexis 88911 at \*2. We have taken the liberty of enclosing a proposed Amended Attachment Order.

We appreciate your Honor's time and attention to the foregoing and we are happy to present ourselves for a conference at any time convenient to the Court to address this matter.

Respectfully submitted,

*Rahul Wanchoo*  
Rahul Wanchoo (RW-8725)

Enclosures.

*The Memorandum, although dated  
December 7, was not provided  
to the Court on December 7.*

*The application is denied.*

*James C. Lee*  
*December 12, 2007*